

**THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

UNITED STATES)	Case No. 17 CR 495
)	
v.)	Judge Andrea R. Wood
)	
ROBERT O'ROURKE)	Magistrate Judge Michael T. Mason

**DEFENDANT'S UNOPPOSED MOTION FOR
SHORT EXTENSION OF TIME TO FILE POST-TRIAL MOTIONS**

Defendant, Robert O'Rourke ("Mr. O'Rourke"), by and through his counsel, Kulwin, Masciopinto & Kulwin, LLP, respectfully moves this Honorable Court, with no objection from the Government, for entry of an Order granting Mr. O'Rourke's motion to extend the time to file his Federal Rule of Criminal Procedure 33(b)(2) motion for a new trial and Federal Rule of Criminal Procedure 29(c) motion for judgment of acquittal from March 25, 2019 to March 28, 2019. In support of this motion, Mr. O'Rourke states as follows:

1. On February 25, 2019, the jury returned a verdict of guilty against Mr. O'Rourke on 10 of the 26 counts charged in the indictment. Dkt. No. 112. Immediately thereafter, Mr. O'Rourke renewed his motion for judgment of acquittal pursuant to FRCP 29(c) and the Court entered a briefing schedule directing Mr. O'Rourke to file his written memorandum in support of his oral motion on or before March 25, 2019. *Id.* Mr. O'Rourke's FRCP 33(b)(2) motion for a new trial is likewise due on or before March 25, 2019. Dkt. No. 111.

2. Counsel has been working diligently to complete Mr. O'Rourke's post-trial motions, however, due to the press of other obligations and the complexity of the issues raised at trial, counsel will be unable to file both motions by March 25, 2019. As such, Mr. O'Rourke requests a short extension of time in order to adequately address all post-trial issues to be raised in the motions.

3. Defense counsel has conferred with the government and there is no objection to this

motion.

WHEREFORE, Defendant Robert O'Rourke respectfully moves this Honorable Court to grant this Motion and extend the briefing schedule on his FRCP 29(c) and FRCP 33(b)(2) motions from March 25, 2019 to March 28, 2019.

Respectfully Submitted,

KULWIN, MASCIOPINTO & KULWIN, LLP

By: /s/ Rachel A. Katz
One of Defendant's Attorneys

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CERTIFICATE OF SERVICE

I, Rachel A. Katz, an attorney, hereby certify that the above *Defendant's Unopposed Motion for Short Extension of Time to File Post-Trial Motions* was served upon all counsel of record via ECF Filing on March 20, 2019.

By: /s/ Rachel A. Katz
One of Defendant's Attorneys